Comments to RM-11306
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I disagree with the overall principle of the ARRL's proposal of bandwidth segmentation as specified in RM-11306 and request the FCC ***not*** adopt it.

The United States is the only country in the world with subband restrictions. If all other countries have no subband restrictions, why will this not work in the United States? Is the United States amateur inferior to those of other countries? Surely not. It's time the United States got in step with the rest of the world.

The ARRL has not provided quantitative evidence that a majority of it's members support RM-11306. As a current ARRL member, I was dismayed to find the ARRL submitted it's proposal without getting feedback from, and publishing comments from, the final draft petition.

I would like to make comments on two issues; bandwidth on the HF amateur bands and the operation of automatically / semi-automatically controlled "robot" stations.

HF Spectrum Bandwidth:

While the ARRL stresses the need for experimentation they handicap amateurs by stipulating a maximum bandwidth of 3.5 KHz in significant portions of the 10 through 160 Meter amateur bands. If experimentation is desired then more bandwidth should be available without new regulation.

I recommend that the Table on page 23 of RM-11306, discussion of 97.305(e), be modified as follows:

Wavelength (Band)	**Frequencies Authorized**	**Maximum Necessary Bandwidth**	**Standards See 97.307(f) Paragraph:**
160M	1.800 – 2.000 MHz	10 Khz	None
75M	3.500-4.000 MHz	10 Khz	None
40M	7.000 – 7.300 MHz	10 Khz	None
30M	10.100-10.150 MHz	10 Khz	None
20M	14.000-14.350 MHz	10 Khz	None
17M	18.068-18.168 MHz	10 Khz	None
15M	21.000-21.450 MHz	10 Khz	None
12M	24.890-24.990 MHz	10 Khz	None
10M	28.00-29.700 MHz	16 Khz	None

Other sections to remain unchanged.

If the FCC, for whatever reasons, still feels bandwidth segmentation is necessary, I recommend that the Table on page 23 of RM-11306, discussion of 97.305(e), be modified as follows:

Wavelength (Band)	Frequencies Authorized	Maximum Necessary Bandwidth	Standards See 97.307(f) Paragraph:
160M	1.800 – 2.000 MHz	***10 Khz***	None
75M	3.620-4.000 MHz	***10 Khz***	None
40M	7.100 – 7.300 MHz	***10 Khz***	None
20M	14.100-14.350 MHz	***10 Khz***	None
17M	18.110-18.168 MHz	***10 Khz***	None
15M	21.150-21.450 MHz	***10 Khz***	None
12M	24.930-24.990 MHz	***10 Khz***	None
10M	***28.120-29.700 MHz***	***16 Khz***	None

Other sections to remain unchanged.

"Robot" Stations:

I oppose the proposed changes to the existing Part 97.221

The primary purpose of automatically and semi-automatically controlled stations, typically referred to as "robot" stations, is to deliver electronic messages (email) via amateur radio. This is typically accomplished via Winlink 2000 utilizing the Pactor-III protocol. Each Pactor III transmission is approximately 2.5 Khz of bandwidth.

From http://www.winlink.org/: "Winlink 2000 Utilizes enabling technologies and sound operating practices to provide a full-featured radio digital message transfer system, worldwide. Email transfer with attachments, position reporting, graphic and text-based weather bulletins and emergency communications are now available to the Amateur radio community by linking radio to the Internet."

While this type of digital message transfer capability over amateur radio serves a need during emergency situations, it should not be used in place of commercial Internet Service Providers (ISP). The existing Part 97.221 rules provide adequate spectrum for the type of experimentation required to provide an email type delivery service via amateur radio in times of emergency.

My concern with the ARRL proposal is harmful interference to existing communications. The ARRL indicates that (Paragraph 16 page 14) "Residual risk of interference from this station (or network) configuration can best be managed by the Amateur community through a combination of technology (including further development of listen-before-transmit protocols) and respectful operating practices (which are already necessitated and practiced by radio amateurs).

The ARRL attempts to justify it's proposed rewrite of 97.221(C) by stipulating that Automatically Controlled stations can operate anywhere in the HF spectrum "provided that the station is ***responding*** to interrogation by a station under local or remote control". This presupposes the station under local or remote control has checked for a clear frequency prior to starting transmission

The problem arises when the locally controlled station specifies multiple robot frequencies to use and initiates the transmission process. The control operator can not determine if multiple frequencies are always free of on-going communications.

The use of the entire HF spectrum for semi-automatic / automatic robot interactions is only justified if one wants an amateur digital message transfer system to be extremely quick and not potentially delayed by the restricted bandwidth available under the current Part 97.221 regulations. If amateurs desire fast email and image transmissions they should use a commercial ISP.

Respectfully Submitted

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